

EXHIBIT 6

From: [Mary Crego Peterson](#)
To: [Nathan J. Arnold](#); [Robbie Tester](#); docs@westwalaw.com; [Dennis McGlothin](#); ["R. Bruce Johnston"](#)
Cc: [Jake Ewart](#); [Michael E. Schmidt](#); [Rosa O. Ostrom](#); [Natalia Corduneanu](#); [Korri Oosting](#); [Manny Jacobowitz](#); [Kelly DEttorre](#)
Subject: RE: Shirley, et al. v. WA State Dept. of Fish and Wildlife, et al. | USDC Western No. 3:23-cv-05077-DGE - Dep of Thomas Moats
Date: Wednesday, January 15, 2025 4:46:00 PM

Dear Nate,

I understand from your email below that you are informing me that plaintiff Moats does not intend to appear for the deposition we have noted for tomorrow, and that plaintiffs Beltz, Wines, Sanchez and Peters also do not intend to appear for the depositions we have noted. If I am misunderstanding your email, please let me know.

I have a different recollection of our last conversation about this issue, which is that whether your clients choose to remain in this case is an issue between you and your clients, and not a question my clients or I can answer, and that if your clients remained in the case we would need to note their depositions before the January 31 discovery cutoff. Since your clients had not withdrawn, we noted their depositions.

If your clients do not intend to remain as parties in this case, the easiest way to resolve this issue is for them to dismiss their claims. If they do intend to remain in the case, please let me know when they will be available for depositions before the discovery cutoff.

Best regards,

Mary

Mary Crego Peterson

Hillis Clark Martin & Peterson P.S.

999 Third Avenue | Suite 4600 | Seattle, WA 98104

d: **206.470.7672** | 206.623.1745 | f: 206.623.7789

mary.peterson@hcmp.com | www.hcmp.com | [vCard](#) | [view my bio](#)

From: Nathan J. Arnold <nathan@ajalawyers.com>

Sent: Wednesday, January 15, 2025 3:05 PM

To: Sopheary Sanh <sopheary.sanh@hcmp.com>; Robbie Tester <Robbie@ajalawyers.com>; docs@westwalaw.com; Dennis McGlothin <dennis@westwalaw.com>; 'R. Bruce Johnston' <bruce@rbrucejohnston.com>

Cc: Mary Crego Peterson <mary.peterson@hcmp.com>; Jake Ewart <jake.ewart@hcmp.com>; Michael E. Schmidt <michael.schmidt@hcmp.com>; Rosa O. Ostrom <rosa.ostrom@hcmp.com>; Natalia Corduneanu <natalia@ajalawyers.com>; Korri Oosting <korri@ajalawyers.com>; Manny Jacobowitz <manny@ajalawyers.com>; Kelly DEttorre <kelly@westwalaw.com>

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[EXTERNAL]

Mary, I cannot confirm this deposition. We discussed this at our last discovery meet and confer. We informed you that the individuals you seek to depose, including tomorrow, settled their claims. You said that you would seek information from your client. Do you have new information that did not occur? In any event, I will add this to the discovery issues we have to bring to the court.

Nathan J. Arnold
ARNOLD JACOBOWITZ & ALVARADO PLLC

Nathan@AJAlawyers.com

[206.799.4221](tel:206.799.4221)

720 Seneca St., Ste. 107, No. 393

Seattle, WA 98020

113 Woodin Ave, Ste 200

Chelan, WA 98816 (not for service)

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From: Sopheary Sanh <sopheary.sanh@hcmp.com>

Sent: Tuesday, January 14, 2025 5:14 PM

To: Nathan J. Arnold <nathan@ajalawyers.com>; Robbie Tester <Robbie@ajalawyers.com>;
docs@westwalaw.com <docs@westwalaw.com>; Dennis McGlothin <dennis@westwalaw.com>; 'R.
Bruce Johnston' <bruce@rbrucejohnston.com>

Cc: Mary Crego Peterson <mary.peterson@hcmp.com>; Jake Ewart <jake.ewart@hcmp.com>; Michael E. Schmidt <michael.schmidt@hcmp.com>; Rosa O. Ostrom <rosa.ostrom@hcmp.com>; Natalia Corduneanu <natalia@ajalawyers.com>; Korri Oosting <korri@ajalawyers.com>; Manny Jacobowitz <manny@ajalawyers.com>; Kelly DEttorre <kelly@westwalaw.com>

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Good afternoon – below please find the Zoom info for the scheduled deposition of Thomas Moats on 1/16/25 starting at 9:30 am.

Please confirm that you and your client will be present. We have reserved a court reporter and may incur cancellation fees for any schedule changes at this point.

Join from PC, Mac, iOS or Android

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646-568-7788

Meeting ID: 99777293247

Videoconference System

H323: 162.255.36.11##99777293247#555712

SIP: [99777293247@162.255.36.11](https://162.255.36.11:5061/join/99777293247)

Sincerely,

Sopheary Sanh

Legal Assistant

Hillis Clark Martin & Peterson P.S.

999 Third Avenue | Suite 4600 | Seattle, WA 98104

d: **206.470.7698** | 206.623.1745 | f: 206.623.7789

sopheary.sanh@hcmp.com | www.hcmp.com

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